

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                     |   |                            |
|---------------------|---|----------------------------|
| In re:              | ) | Case No. 19-23977          |
| William J Broderick | ) | Chapter 13                 |
|                     | ) | Judge: A. Benjamin Goldgar |
| Debtor              | ) |                            |

**NOTICE OF MOTION AND CERTIFICATE OF SERVICE**

William J Broderick  
1270 Forest Ave.  
Highland Park, IL 60035

DAVID M SIEGEL  
790 CHADDICK DR  
WHEELING, IL 60090

Please take notice that on December 06, 2019 at 11:00 am, a representative of this office shall appear before the Honorable Judge A. Benjamin Goldgar, at the Park City Branch Court, 301 Greenleaf Ave, Rm B, Park City, IL 60085 and present the motion set forth below. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

I certify that this office caused a copy of this notice to be delivered to the above listed debtor by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on November 19, 2019.

/s/ Glenn Stearns

FOR: Glenn Stearns, Chapter 13 Trustee

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**MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtor filed a petition under Chapter 13 on Monday, August 26, 2019.
2. The Debtor has failed to:
  - a. Provide financial statements to support the Debtor's self employment income.
  - b. File an amended plan.
3. As a result, the Debtor has failed to comply with the Bankruptcy Code and has caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Respectfully Submitted;

Glenn Stearns, Chapter 13 Trustee  
801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350

/s/ Glenn Stearns

FOR: Glenn Stearns, Chapter 13 Trustee